


immediately seek and serve discovery, including third-party discovery, relating to the claims, defenses, and issues in *Hernandez*, civil action 21 Civ. 7406 (CM)(GWG). The parties further agree that:

1. All parties will abide by the protective order entered as Docket 115 in civil action 20 Civ. 8924 (CM)(GWG) in this matter; and
2. All discovery that has been and will be conducted in the consolidated cases will be deemed part of *Hernandez*, without the need for either party to re-disclose it, respecting any confidentiality designations that are in place.

Dated: December 15, 2021
New York, New York

[SIGNATURES ON FOLLOWING PAGE]

COHEN&GREEN P.L.L.C.

By:  Remy Green
Elena L. Cohen
J. Remy Green
Jessica Massimi

1639 Centre Street, Suite 216
Ridgewood (Queens), NY 11385
t: (929) 888-9480
f: (929) 888-9457
e: elena@femmelaw.com
remy@femmelaw.com
jessica@femmelaw.com

-and-

Gideon Orion Oliver
277 Broadway, Suite 1501
New York, NY 10007
t: 718-783-3682
f: 646-349-2914
Gideon@GideonLaw.com

Attorneys for Hernandez Plaintiffs

NYC CITY LAW DEPARTMENT

By: Dara L. Weiss s/
Dara L. Weiss
100 Church Street
New York, New York, 10007
(212) 356-3517
Phone: (212) 356-3517
Fax: (212) 356-3509
Daweiss@law.nyc.gov

Attorney for Defendants